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Counsel to Plaintiff RDC Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Advisory Trust Group, LLC, as trustee of the RDC
LIQUIDATING TRUST,

Plaintiff,

v.

ABBVIE US LLC,

Defendant.

Chapter 11

Case No. 20-20230 (PRW)

Adv. Proc. No. 2-22-02001-PRW

FOURTH STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc. (“Debtor”), and defendant, Abbvie US LLC (“Defendant” and, together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the “Summons”) was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;
and

WHEREAS, on March 1, 2022, the Parties entered into a stipulation (the “First Stipulation”) by which the time required for Defendant to answer the Complaint was extended through and including April 15, 2022. The First Stipulation was approved by order entered March 4, 2022.

WHEREAS, on March 28, 2022, the Parties entered into a stipulation (the “Second Stipulation”) by which the time required for Defendant to answer the Complaint was further extended through and including July 15, 2022. The Second Stipulation was approved by order entered March 29, 2022.

WHEREAS, on June 7, 2022, the Parties entered into a stipulation (the “Third Stipulation”) by which the time required for Defendant to answer the Complaint was further extended through and including August 31, 2022. The Third Stipulation was approved by order entered June 8, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject to Court approval, to further extend the time for the Defendant to answer the Complaint to and including November 18, 2022.

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2. All other terms set forth in the First Stipulation, Second Stipulation, and Third Stipulation remain in full force and effect.

Dated: August 22, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

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Counsel to Plaintiff RDC Liquidating Trust

SO ORDERED:

DATED: _____, 2022
Rochester, New York

Dated: August 22, 2022

KOHNER, MANN & KAILAS, S.C.

Samuel C. Wisotzkey

Samuel C. Wisotzkey (WI Bar No. 1029537)

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Counsel to Defendant Abbvie US LLC

HON. PAUL R. WARREN
United States Bankruptcy Judge